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that Miller et al. discloses all of the limitations of applicants' independent claims. This ground of rejection is respectfully traversed for the following reason.

First, as the three rotatable plates of applicants' claims 1 and 15, the Office Action cites one of the elements of FIG. 4 identified by reference numeral 18. However, according to Miller et al., at paragraph 89, element 18 is an actuator. An enlarged view of actuator 18 is shown by Miller et al. in FIG. 6. Clearly then, actuator 18 is not a plate. Rather, it appears to be a set of beams and elastic members.

Second, truss 54 (FIG. 6) of Miller et al., cited by the Office Action as being applicants' claims' plate attachment point, is not a plate attachment point, since it does not attach to any plate. Instead, also per paragraph 89 of Miller et al., truss 54 concentrates the force produced by actuator 44.

Third, posts 40 of Miller et al., cited by the Office Action as being applicants' claims' posts, do not couple any movement to plate 14, let alone the movement of a moveable plate attachment point to the moveable plate, as required by applicants' claim. The former is true because posts 40 of Miller et al. are each rigidly affixed to substrate 12, and do not move at all, so they cannot couple any motion. The latter is true because, as noted, there are no plate attachment points in Miller et al. that correspond to applicants' recited plate attachment points, and hence there can be no coupling of movement of an item that does not exist.

Fourth, with regard to applicants' recited springs versus various springs or flexible elements shown in Miller et al., applicants note that it is well-settled that merely finding an element of the same general type in a reference is insufficient to anticipate an element of a claim unless the element in the reference is situated similar to the recited element and performs the same specific function. In other words, the element in the reference must have the same relationship to other elements in the reference as the element in the claim has to other elements in the claim. So, the fact that Miller et al. has various springs or flexible elements, without more, does not make those springs or flexible elements applicants' springs. Rather, the fact that there are no springs in Miller et al. that have the relationships prescribed by applicants' claims indicates that those springs of Miller et al. are not applicants' springs and cannot anticipate applicants' springs. That the springs of

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Miller et al. do not have the same relationships as do applicants' recited springs is clear from the fact that, as indicated hereinabove, Miller et al. does not have rotatable plates, and hence cannot have springs attached to the nonexistent rotatable plates.

Since dependent claims 2-6, 8-10, and 12-14 depend from independent claim 1 and include all the limitations of independent claim 1 from which they ultimately depend, each such dependent claim is also allowable over Miller et al. under 35 U.S.C. 102.

Rejection Under 35 U.S.C. 103(a)

Claims 7 and 11 are rejected under 35 U.S.C. 103(a) as being unpatentable over Miller et al. in view of United States Patent No. 5,535,047 issued to Hornbeck on July 9, 1996.

Each of these grounds of rejection applies only to dependent claims, and each is predicated on the validity of the rejection under 35 U.S.C. 102 given Miller et al. Since the rejection under 35 U.S.C. 102 given Miller et al. has been overcome, as described hereinabove, and there is no argument put forth by the Office Action that Hornbeck supplies that which is missing from Miller et al. to render the independent claims anticipated, and applicants agree that Hornbeck does not supply such elements, these grounds of rejection cannot be maintained.

Therefore, applicants' claims are allowable over Miller et al. in view of Hornbeck under 35 U.S.C. 103(a).

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Conclusion

It is respectfully submitted that the Office Action's rejections have been overcome and that this application is now in condition for allowance. Reconsideration and allowance are, therefore, respectfully solicited.

If, however, the Examiner still believes that there are unresolved issues, he is invited to call applicant's attorney so that arrangements may be made to discuss and resolve any such issues.

In the event that an extension of time is required for this amendment to be considered timely, and a petition therefor does not otherwise accompany this amendment, any necessary extension of time is hereby petitioned for, and the Commissioner is authorized to charge the appropriate cost of such petition to the **Lucent Technologies Deposit Account No. 12-2325**.

Respectfully,

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By


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